

# EXHIBIT 8

1 UNITED STATES DISTRICT COURT  
2 EASTERN DISTRICT OF CALIFORNIA

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4 MATTHEW PETERSON, SADIE FLODING,  
5 COLIN STRUB, CARSON BRENDA, JODY  
6 BARRY, TEISCHA BENSON, LYNNETTA  
KLAM, and LORI DAVIES,

**CERTIFIED  
TRANSCRIPT**

Plaintiff(s),

7 vs.

Case No.  
1:22-cv-00701 JLT-CDB

8 THOMSON INTERNATIONAL,  
9 INCORPORATED, a California corporation;  
DOES 1-10, INCLUSIVE; and ROE  
10 ENTITIES 1-10, INCLUSIVE,

11 Defendant(s).

12 \_\_\_\_\_/

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14

REMOTE DEPOSITION OF

15

COLIN STRUB

16

Tuesday, January 9, 2024

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19 REPORTED BY:

20 DEBRA J. SKAGGS, CSR 7857

21

22

EMERICK AND FINCH  
Certified Shorthand Reporters  
18 Crow Canyon Court, Suite 125  
San Ramon, California 94583  
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1 BE IT REMEMBERED that, pursuant to Notice, and  
2 on Tuesday, January 9, 2024, commencing at the hour of  
3 10:04 A.M., thereof; in their respective locations via  
4 Zoom, as noticed by the attorneys for the Defendants,  
5 GREENAN, PEEFFER, SALLANDER & LALLY LLP, 2000 Crow Canyon  
6 Place, Suite 380, San Ramon, California, was before me,  
7 DEBRA J. SKAGGS, CSR No. 7857, a Certified Shorthand  
8 Reporter, State of California, remotely appeared.

9 COLIN STRUB,  
10 produced as a witness herein, in the above-entitled  
11 action, who, being by me first remotely duly sworn or  
12 having affirmed, was thereupon examined and testified as  
13 a witness in said action.

14 --o0o--

15 (Witness sworn in.)

16 --o0o--

17 PROCEEDINGS

18 THE REPORTER: Mr. Strub, will you state your  
19 name and where you're located? City and state.

20 THE WITNESS: Colin Strub. Denver, Colorado.

21 THE REPORTER: Thank you.

22 And will the attorneys state their  
23 appearances, and who they represent, and where they're  
24 located, please.

25 ATTORNEY LIEN: Lindsay Lien on behalf of

1 THE WITNESS: My wife has just been witness to  
2 the digestive issues that I -- and complications that  
3 I've had since testing positive for salmonella.

4 ATTORNEY CHEN: Q. Anything else?

5 A. That she's witnessed?

6 Q. Yeah.

7 A. No. I mean, she --

8 Q. Is she a witness to your damages in this  
9 lawsuit?

10 A. Yeah, just -- I would just say the digestive  
11 issues that I've had since testing positive for  
12 salmonella.

13 Q. You said that you tested positive for  
14 salmonella. What kind of symptoms did you have?

15 A. Initially I was having abdominal discomfort  
16 and pain. Then I had diarrhea, bloatedness -- a lot of  
17 diarrhea. So just abdominal pain at the time; digestive  
18 issues.

19 And then I found out I tested positive for  
20 salmonella, so then I continued to experience those  
21 issues, and then I've had lingering issues since.

22 So. A lot of irregular bowel movements; a lot  
23 of inconsistencies. Constipation, bloatedness,  
24 gassiness, diarrhea, abdominal discomfort.

25 Q. When did the first -- symptoms first begin?

1 antibiotic.

2 Q. Did you take any other medications for  
3 salmonella?

4 A. I don't believe so.

5 Q. Other than talking to your physicians, when  
6 was the second time you actually saw a physician after  
7 your initial visit with Dr. Schultz?

8 A. I don't recall when my follow-up was.

9 Q. Describe your diarrhea symptoms in June 2020.

10 A. Just irregular diarrhea; kind of irregular  
11 bowel movements with some abdominal discomfort and  
12 bloating. Very inconsistent bowel habits, I guess.

13 Q. Were you working full-time in June 2020?

14 A. Yeah -- yes.

15 Q. How many days did you work?

16 A. Five days a week.

17 Q. How many hours a day?

18 A. I believe it was 8:00 to 5:00. I mean --  
19 then -- you know. When -- those are salaried hours, but  
20 I, you know, would work extra hours occasionally.

21 Q. And you didn't miss any work because of  
22 salmonella in June 2020?

23 A. Not outside of regular appoint- -- like, these  
24 appointments or, you know, doing stool samples. I don't  
25 recall missing any additional time.

1 Q. Did you miss any work in July 2020 because of  
2 salmonella?

3 A. I don't recall. I don't -- again, it would  
4 just be stepping out for these appointments. So you  
5 would be missing maybe an hour or two; a couple hour- --  
6 you know, however long it takes you to get to the  
7 appointment or pick up a stool sample kit, take the  
8 stool sample, drop it off. Those types of things.

9 Q. But there was no salary reduction for  
10 doctor appointments or tests; right?

11 A. Correct.

12 Q. And you are not an hourly employee; right?

13 A. That's correct. Salaried.

14 Q. Did your diarrhea stop in June or July 2020?

15 A. No.

16 Q. Did the patterns change in July 2020?

17 A. Really since then it's been very inconsistent  
18 bowel movements. You know, I -- I thought once the  
19 salmonella was out that you would be done. But I've had  
20 diarrhea, bloating, constipation -- just a lot of  
21 digestive issues still ongoing to this day.

22 So it -- I was expecting it to stop and it  
23 just kind of kept going, which I was surprised by.

24 Q. You testified earlier today that you had  
25 abdominal pain and you sought treatment for abdominal

1     **Q.           What's the frequency of the bowel movements**  
2     **during the day?**

3     A.           Now or in June 2020?

4     **Q.           In June 2020 when you had salmonella.**

5     A.           I would have numerous bowel movements from  
6     what I recall. I don't know how many.

7                 More than usual.

8     **Q.           What's the frequency in the day?**

9     A.           I don't recall.

10                Multiple.

11   **Q.           When you say "multiple," what's the number you**  
12   **put for multiple?**

13   A.           I didn't count them.

14                Four or five. I don't recall. More.

15                I mean, it stood out to your normal everyday  
16   bowel movements.

17   **Q.           How long did you have multiple bowel movements**  
18   **in June 2020?**

19   A.           I don't recall how long it lasted. Probably  
20   as long as I was still testing positive for the  
21   salmonella.

22   **Q.           How long did you test positive for salmonella?**

23   A.           I want to say roughly -- it took about --  
24   approximately three weeks or so. It was multiple tests.

25   **Q.           Let's talk about the second week you had**

1 with any other medical conditions, that once you're  
2 negative you're not going to see those symptoms ongoing.  
3 But I continued, and I was surprised to ask about why --  
4 you know -- I tried to get answers from the doctor  
5 trying to figure out why I was still having, you know,  
6 diarrhea, inconsistent bowel movements, flatulence,  
7 bloatedness. These were all things that were happening  
8 very regularly, and continued, and a lot of these things  
9 I'm still dealing with today.

10 **Q. Did the symptoms ever get better?**

11 A. No. I mean, they're still unresolved. I'm  
12 still ongoing trying to make it better. I've tried  
13 multiple things to try to make them better.

14 **Q. Did you have diarrhea yesterday?**

15 A. Yesterday -- probably within -- a little runny  
16 in the past couple days.

17 **Q. How many bowel movements did you have**  
18 **yesterday?**

19 A. Two to three maybe.

20 **Q. The day before?**

21 A. I don't -- I don't know. I'd have to go  
22 check. Or...

23 **Q. The day before is Sunday, January 7, 2024. Do**  
24 **you remember how many bowel movements you had on that**  
25 **date?**



1 when it was done and who my insurance provider was at  
2 the time.

3 **Q. What was the reason that Dr. Kraus performed a**  
4 **colonoscopy on you?**

5 A. The most recent one I did because -- which I  
6 think was probably about a couple -- within a couple --  
7 about a couple of years after my last one, and that was  
8 done because I would still -- I was still having these  
9 digestive issues. At times, like, a constipation;  
10 feeling bloated; not being able to have a bowel  
11 movement; feeling like something was blocking my  
12 digestive system. And I wanted to be sure that there  
13 was nothing else going on because I was getting really  
14 concerned and, you know, I didn't know if this was,  
15 like, a cancer thing or -- there just was something that  
16 just has not seemed right, and I kind of wanted to do it  
17 for peace of mind, just because my digestive system has  
18 been very regular for many years, and it's just been --  
19 it's just been tough. Sometimes sitting for a long time  
20 not being able to go, and then sometimes you're having  
21 diarrhea -- multiple -- it's just -- it's just wanting  
22 to make sure that there wasn't anything more serious  
23 going on.

24 **Q. Are you working from home now, or do you work**  
25 **in the office now?**

1 anticipating that I will need to try to see if --

2 **Q. What kind of -- what kind of treatment did she**  
3 **provide to you on the second visit?**

4 A. She also took a -- what is it -- I believe it  
5 was an ultrasound. Trying to measure I think the --  
6 maybe the size of my rectum; and looking to do physical  
7 therapy exercises; and kind of, like, manipulations with  
8 those exercises to try to improve with my bowel  
9 movements. And she thought I could try taking, like, a  
10 laxative, and then after the first appointment, kind of  
11 try to just do, like, a MiraLAX cleanout of my bowels to  
12 kind of start from a point after that to then start  
13 working on these -- these exercises, and physical  
14 therapy, and trying to see if I can, you know, work on  
15 some things that she thought might be causing some of  
16 my -- some of these issues.

17 **Q. Did your symptoms get better after the second**  
18 **visit?**

19 A. I'm still going, so I don't think I'm better.

20 **Q. What kind of treatment did she provide to you**  
21 **on the third visit?**

22 A. I don't -- I think a lot of -- or I think the  
23 visits -- I don't know if I'm in number three or number  
24 four. I don't know. But, I mean, I have done, like,  
25 some stretching; done some, like, massage in the stomach

1 sometimes at work; sometimes at home: not able to go.  
2 And you try again in an hour -- sometimes the same  
3 result. Sometimes, for whatever reason in 30 minutes,  
4 then you're able to go. I mean, the only thing  
5 consistent, really, is the inconsistency of my bowel  
6 movements. It's just -- which is why I'm trying to --  
7 try this other angle to try to see if I can make some  
8 improvements to where at least I don't have to sit for a  
9 while and I can actually just go.

10 Like, there is not a blockage, which was kind  
11 of my concern and my wanting -- to try my last  
12 colonoscopy because I was concerned that there -- there  
13 just does feel like a block. I mean, it's kind of like  
14 a feeling, like, you've just had your Thanksgiving  
15 dinner; you're very full; you know that you have to go.  
16 And then you go and you sit, and for whatever reason  
17 it's just not coming out. So I'm trying to make it  
18 where I can at least just go sit and have a bowel  
19 movement without waiting so long.

20 So that's -- that's kind of my constipation  
21 feeling. It's -- you know, you feel like your stomach's  
22 bloated and out, and you feel like you need to relieve  
23 it. And sometimes I feel like when you're not able to  
24 relieve yourself, it just starts feeling a lot of  
25 pressure inside; a little bit of bloatedness and

1 bloatedness, gassiness; and then occasional -- with  
2 constipation and occasional abdominal discomfort.

3 **Q. I'm actually asking about your current**  
4 **emotional distress symptoms caused by salmonella now.**

5 **Do you have any emotional --**

6 A. Emotional symptoms, I guess, are dealing with  
7 the stress of not being able to have a bowel movement in  
8 a timely manner and being gone from work for a while, or  
9 not being able to take care of my kids because I'm  
10 sitting on the toilet for a while.

11 So all the things that cause the stress  
12 related to me not having a regular digestive system that  
13 I used to have are stressful. And -- yeah.

14 **Q. I think we can take a break maybe till**  
15 **3:00 o'clock, I guess. 3:00 o'clock Pacific time.**

16 ATTORNEY LIEN: How much more do you have,  
17 Helen?

18 ATTORNEY CHEN: I don't have much -- not much  
19 more, but I think I'll just take a break for Debra's  
20 sake. Because it's been more than an hour, and Debra  
21 needs to take a break.

22 ATTORNEY LIEN: Okay.

23 ATTORNEY CHEN: Just 15 minutes.

24 THE REPORTER: Off the record?

25 ATTORNEY CHEN: Yes.